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DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 7/31/2023

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July 28, 2023

Via ECF and Electronic Mail

The Honorable Analisa Torres  
United States District Judge for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Fernandez, et al. v. Pinnacle Group NY LLC, et al., 21-cv-10702-AT

Dear Judge Torres:

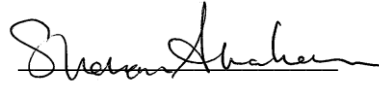
We represent named-Plaintiff Edgar Fernandez and the eight opt-in Plaintiffs (together as “Plaintiffs”) in this collective action brought against Defendants Pinnacle Group NY LLC, and Joel Wiener, individually. Pursuant to this Court’s May 31, 2023 Order, the parties’ respective motions for summary judgment are due today, July 28, 2023. (ECF No. 77). We write now to request an extension until Monday, July 31, 2023, to file Plaintiffs’ Motion for Partial Summary Judgment. We understand that paragraph I(C) of this Court’s Individual Practices in Civil Cases requires such requests to be made forty-eight hours prior to the scheduled deadline. We apologize for the delay in making this request, as every effort was made to avoid its necessity. However, due to the voluminous document production in this case, which includes years of daily timesheets for all nine Plaintiffs, Plaintiffs need a little more time, until Monday, to complete the motion for partial summary judgment and compile all the exhibits.

This is Plaintiffs’ first request for an extension of this deadline. Defendants’ counsel consents to this request, provided that the deadline to file motions for summary judgment is extended for all parties. This extension will affect the deadlines for the parties’ opposition briefs and reply briefs, which are currently due on Friday, August 18, and Friday September 1, respectively. We request that those deadlines be extended as well, so that the parties’ opposition

briefs would be due on Monday, August 21, and reply briefs would be due on Tuesday, September 5, 2023.<sup>1</sup>

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sharan R. Abraham'.

Sharan R. Abraham, Esq.

*For the Firm*

C: All Counsel of Record (*via* ECF)

GRANTED.

SO ORDERED.

Dated: July 31, 2023  
New York, New York

A handwritten signature in black ink, appearing to read 'Analisa Torres'.

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ANALISA TORRES  
United States District Judge